

UNITED STATES DISTRICT COURT  
District of Maryland  
101 West Lombard Street  
Baltimore, Maryland 21201-2691

Civil Case No.: \_\_\_\_\_

FILED  
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ENTERED  
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MAR 18 2021  
CLERK U.S. DISTRICT COURT  
AT BALTIMORE,  
DISTRICT OF MARYLAND  
DEPUTY

TERRENCE ANDERSON  
PLAINTIFF PRO SE  
VS.  
SGT. W. THOMAS  
COII C.DOLLY  
ET.AL & OTHER OFFICIAL'S  
HELD ME DOWN, I DON'T KNOW  
THEIR NAMES UNTIL FURTHER DISCOVERY  
CORIZON HEALTH CONTRACTOR'S  
WILLIAM JAMES REEMAN RN ASST. DIRECTOR OF NURSES  
ALL PARTIES NAMED IN THIS SUIT  
ARE BEING SUED IN THEIR INDIVIDUAL &  
OFFICIAL CAPACITIES FOR \$150,000.00 ONE  
HUNDRED FIFTY THOUSAND DOLLARS & CORIZON  
IS BEING SUED FOR \$150,000.00  
FOR IT'S HIRING PRACTICES. PLAINTIFF REQUESTS THE COURT CLERK  
TO SERVE ALL DEFENDANTS & DEFENDANT CORIZON,  
SUMMONS AND COPIES OF THIS COMPLAINT

Verified Civil Complaint with Jury Demands on All  
Defendant's and Defendant Corizon  
Jurisdiction and Venue: This is the Proper Venue

This is a Civil Action authorized by 42 U.S.C. Section 1983 to Redress the Deprivation Under Color of State Law of Right Secured by the Constitution of the United States. This Court has jurisdiction under 28 U.S.C. Section and 1343 (A)(3).

This District of Maryland is an appropriate venue under 28 U.S.C. Section 1331 (b)(2) because it is where the events giving rise to this claim occurred.

This Court also has supplemental jurisdiction over Plaintiff's State claim pursuant to 28 U.S.C. Section 1337

PARTIES

1.) During all times mentioned in this complaint, the Plaintiff, Mr. Terrence Anderson, ("hereinafter Mr. Anderson"), was and is a citizen

of the United States, residing at the North Branch Correctional Institution, 14100 McMullen Hwy, SW, Cumberland, Maryland 21502-5777, in Allegheny County, Maryland. The Plaintiff is over the age of 18 years old and testifies as follows:

2.) At all times mentioned herein and material to this complaint, the Defendant Sgt. W. Thomas was and is a supervisor of Housing Unit 1, on the 7x3 shift. He is a correctional official, employed by the Maryland D.O.C. ("hereinafter Mr. Thomas") Place of business and location is North Branch Correctional Institution, 14100 McMullen Hwy., SW, Cumberland, Maryland 21502-5777, in Allegheny County, Maryland.

3.) At all times mentioned herein and material to this complaint, the Defendant, COII, C. Dolly was and is a correctional official whom is employed by the Maryland D.O.C. ("hereinafter Mr. Dolly"). Place of business and location, North Branch Correctional Institution, 14100, McMullen Hwy, SW, Cumberland, Maryland, 21502-5777. Mr. Dolly also works on the 7x3 shift at North Branch.

4.) CORIZON Inc. F/K/A ("hereinafter "Corizon") is and was a corporation licensed to transact in business with the State of Maryland's Department of Corrections. Corizon employs Medical Doctor's and Physicians Assistant's for the purpose of providing medical care and treatment to prisoner's such as Plaintiff, who are and were incarcerated at the North Branch Correctional Institution. Plaintiff contacted CEO Mr. Steve Rector, at this address: Corizon Health Care Support Team, Office 103, Powell Court, Brentwood TN 34024. Plaintiff also contacted Contract Manager, Jim Tinney at 535 House of Correction Rd. Jessup, MD 20794. The Plaintiff is challenging their hiring practises, training practices and/ or experience of their employees, nurses, RN's, LPN's, RNP's, PA's and doctors for providing negligent and inadequate medical care to inmates like myself.

5.) At all times mentioned herein and material to this complaint, the Defendant, Assistant Director of Nurse's at N.B.C.I. and W.C.I., William James Beeman RN, who schedules all medical appointments for sick call, Doctor's appointments and chronic care, is and was employed as a Medical Assistant Director of Nurse's by Corizon, located at North Branch Correctional Institution, N.B.C.I. & W.C.I., 14100 McMullen Hwy, SW, Cumberland, MD 21502-5777 ("hereinafter Mr. Beeman") of the 7x3 shift, in Allegheny County, Maryland.

#### STATEMENT OF FACTS

6.) On November 27th, 2019, I Terrence Anderson #314-588, derive at N.B.C.I. with a number of chronic health conditions and had been to N.B.C.I. before. Once at this location, Mr. Anderson was placed on Administrative Segregation in cell 1-D-24. Once there, Mr. Anderson started informing the tier officer, a regular COII named Frantz, that he was to receive a 2400 calorie diet (no egg). He was given a regular diet for (2) two days straight. He informed the tier officer to allow dietary to do their job. Mr. Anderson waited for the tier officer to come around and open the slot for lunch. Mr. Anderson informed COII Frantz that there is a dietary problem with him not receiving the correct diet and that this problem should be handled by dietary not security.

7.) COII Frantz became very irate and stated "You don't tell me what to do". I had my hand and my face down in the slot talking to him. I stated that I had not received my tray and the feed up worker stated that it didn't come down as of yet. Officer Frantz stepped back and tried to close the slot and it hit my hand. COII Frantz proceeded to pull out his pepper spray and started to deploy it through the slot into my face and cell, then closed the slot door.

DOC POLICY & PROCEDURES

8.) Once the pepper spray is deployed, the officer's must contact his or her immediate supervisor, whom in this case was Sgt. Thomas. He came onto the tier with three of four other officers. Next, the inmate must be taken to medical and been seen by medical personnel in order to remove the mase (chemicals) off of the inmate. Mr. Anderson does not know all of the officer's names that came with Sgt. W. Thomas. He won't have that information until a later date when further discovery is ordered. I am asking for a copy of the back dated camera film. I was escorted to the medical room in Housing Unit #1. There is no camera in that room.

ONCE INSIDE THE MEDICAL ROOM

9.) Upon information and belief and my own personal knowledge, as I explained, I have been in this institution before. There is no camera inside the medical room and this is one of the blind spots inside of N.B.C.I.. This is why I am asking for the footage leading up to me going into the medical room. Once I seen the Assistant Director of Nursing, William James Beeman, RN of N.B.C.I. and W.C.I. I know that inmates have been assaulted in that room. But I didn't think particularly that I would be assaulted in this room today because Mr. Beeman was present. I could hardly see because the chemicals where in my eyes and all over my face.

10.) My hands were cuffed behind my back. I was trying to explain to Mr. Beeman exactly what happened. Then some officer's grabbed my legs and arms and I seen Sgt. W. Thomas moving toward me with a black grove with metal on it. He hit me right in my eye and repeatedly hit me on the right side of my face until I lost consciousness. This is why I am asking for camera and serve and back up data to this date and time.

ONCE I REGAINED CONSCIOUSNESS

11.) Once I (Mr. Anderson) regained consciousness, he was sitting inside a holding cage for one person. There was a pool of my own blood, and my eye was swollen closed. About five inches away from my face was sitting blood coming from my mouth and nose, my clothes bleed. There is a pool of blood on the floor in front of me. Even my underwear had blood in them in the front and the back. I am afraid. The same officer's started to approach me that were in the medical room with me before I lost consciousness. They stated they were going to take me back to my cell. I stated that I'm not going anywhere until I see medical personnel. They stated that I was just seen by William James beeman RN, whom stated you refused treatment. That is not true.

12.) While I was trying to explain to Mr. Beeman what had happened when Sgt. W. Thomas started punching me in my face until I lost consciousness while the same officer's held me down whom are waiting to escort me

back to my cell. I am not going anywhere until I see a nurse. The nurse came and I explained what happened to me and she called P.R.E.A. on 12-2-19. After P.R.E.A. came, RNP Holly Hoover seen me and my face and sent me out to Western Maryland Health System Regional Medical Center, P.O. Box 539, 12500 Wilcoedrock Road, SE, Cumberland, MD 21502.

ONCE OUT AT HOSPITAL

13.) My eye was badly damaged. My right zygomatico-axillary complex fractured. I needed to be sent out to Bon Secours, the hospital which is contracted with CORIZON whom had the contract for prisoner's ... and was the hospital used by the State of Maryland for prisoner's and this was told to the employees of Corizon. Until this day, that has not happened November 20th, 2020. Now I am suffering from further actual injury as a direct result of staff superintending my medical treatment.

14.) Security staff regularly sits in on medical interviews with the PA's, RNP's, Doctors and nurses. After the inmates leave then they assert their security and personal concerns about what they believe the inmate's medical condition is and or pressuring the health care provider. Who may be related by blood, marriage, community ideology, interests, political beliefs, economic interests, racial and religious beliefs.

THERE WAS AN ADJUSTMENT HEARING

15.) On 11/29/2019, COII Frantz wrote an adjustment against Mr. Anderson claiming he refused to comply with his orders to remove his arm out of the slot. Where these officer's can just say an inmate refused and held an adjustment hearing on Mr. Anderson in absentia. At N.B.C.I. this is an all white Administration. Most are related by blood or other means. No outside or minority or women given power over these men. Like all the facility representatives go on to become adjustment hearing officer's. In the same room there was the facility representative like Sgt. Jamie Farris, whom now is an adjustment hearing judge. Like Sgt. Wedlock, whom was a facility Rep., is now an Adjustment Hearing Judge. Tell me this is not bias and they are the officer's in the institution. They monopoly were the inmates only see these officers, Judges.

PERSONAL KNOWLEDGE & INFORMATION

16.) Based upon information and belief and my own personal knowledge. As I explained, I've been in this institution before. They have one or two or a few minority's or women to show someone if you are on the outside looking in. But they have their ideology, like in this case before the Court. COII Dolly has a father and two brothers that work on the same 7x3 shift, a fact of discovery if allowed.

17.) This is a direct violation of D.O.C. policy, Why? Because if something were to happen to one of them, they would all right the wrong and put other officer's in danger. This is why D.O.C. tells them they don't want immediate family working on the same shift. It is deeper than this, but it is important to see they are not following policy or listening to anyone outside of Cumberland, MD. SW

I WAS FOUND GUILTY AT MY ADJUSTMENT HEARING

18.) In Mr. Anderson's absentia, he was found guilty at his adjustment hearing. Now at no time did anyone state what had happened to Mr.

Anderson's face and why he had to be sent out emergency to the hospital. Sgt. W. Thomas was given a high rank, Lt. Thomas and sent over to W.C.I.. COII Dolly was moved off of the tier I'm housed on and out of the building and the officer's that were involved were all moved around. The point here is this, the administration is trying to tell inmates that you can't win against us. That they have all bases covered. They want inmates to resort to violence.

I.I.D. CLAIMS TO BE INVESTIGATING THE INCIDENT

19.) I.I.D. claims to be investigating the ex-correctional officers too and until this date November 10th, 2020, no one has responded back to me on my turn of events and their the officers never stated how my face got in that condition, again a violation of D.O.C. policy. A report should have been written for use of force, no report was written, Why?

PRISON LITIGATION REFORM ACT EXHAUSTED

20.) Mr. Anderson filed an ARP to the Warden on 12-10-2019. No response, the Appeal was filed to the Commissioner on 2-3-20. The Appeals was filed to the I.G.O. on 3-17-20. Mr Anderson's response back on 7-13-20, PLRA completed.

CAUSE OF ACTION

21.) Find that the cause of action Sgt. W. Thomas and COII C. Dolly, used on November 29th, 2019, repeatedly punching me (Mr. Anderson) in my face, while COII C. Dolly held him down, was an Eighth Amendment violation and cruel and unusual punishment, outrageous conduct vs. Unconstitutional Conduct. We don't know if a sexual assault happened or not.

22.) The acts alleged herein were intentionally performed with deliberate indifference through custom, without legal justification or excuse, but with malice and an evil or rancorous motive, influenced by hate. The purpose being to deliberately and willfully injure plaintiff (Mr. Anderson).

23.) Find that Cause of Action, William James Beaman, RN Assistant Director of Nurses at N.R.C.I. and W.C.I., was and is an Eighth Amendment violation for refusing to provide treatment, were otherwise careless, reckless and gross negligence. Amounting to wanton and reckless disregard for life.

24.) Deliberate Indifference to a high degree of probability. Extremely outrageous, and beyond the bounds of decency in society. We don't know if he participated in these acts or not. But we do know he was present, this is why further discovery is needed from the outside camera's of the date and time serve and back up data.

25.) Find that Corizon Action and questioning hiring practice, experience of these kind of act's of their employees are allowed by this Honorable Court. Most of their employees have troubled backgrounds and work in the interests of these companies, not for the citizens or the patients. This is a known fact of these companies move into State's leaving the taxpayer's with the bills.

26.) For maiming, disability, Patients, inmates taxpayer's citizen of the State. And the taxpayer's are left with the cost for long distance, not these company's, they move onto other States leaving behind the same mess in New States.

27.) So, yes we want to know their hiring practices. It is of the public interest and we want to know their employees experience and educational background. The Federal Government give a check to these companies by way of the State and these company's leave the State after failing to provide the service that was paid for by the State, leaving behind disabled inmates, patients and some die.

28.) They are handing the taxpayer's of the State a bill that needs to be paid by them. Yes we must hold them accountable for the check the taxpayer's gave them.

CLAIM OF VIOLATIONS

Eighth Amendment Violation

Deliberate Indifference

Cruel and Unusual Punishment

Negligence and Violation of State and Federal Laws

A.) Find that Sgt. W. Thomas and COII C. Dolly, violated D.O.C. policy by not writing a use of force report and violated the above claims.

B.) Find that William James Beeman, RN, Assistant Director of Nurse's, N.B.C.I. and W.C.I. by refusing to treat Mr. Anderson. That is and was gross negligence to leave a patient, a citizen, an inmate in a pool of his own blood, unconscious and another nurse had to come and treat Mr. Anderson. Then that is when the Nurse called P.R.E.A. on Mr. Anderson's behalf about a sexual assault because she saw the blood on the front and the back of Mr. Anderson's underwear.

C.) Also find that William James Beeman, RN, Assistant Director needed to testify under oath to what happened inside of that room on the date in question.

D.) Find that Corizon hiring practice and employees background and education and experience should be questioned and is a matter of public interest to the taxpayer's of the State of Maryland and information is a must have and whom handle the complaint of their employees before coming into this Honorable Court, whom fix these problems.

E.) Find that all Defendant's but Corizon fail to exercise the degree of skill and care necessary under the circumstances.

F.) Find that all Defendant's but Corizon departed from generally accepted medical policy and D.O.C. policy and practices and procedures leading to endangering a citizen, patient, an inmates life.

G.) Find that all Defendant's but Corizon cause pain and suffering directly and proximately resulting in breaches of care and further injuries to his person (Mr. Anderson) by not sending him out to the

contractor's hospital, Bon Secours, ever since it had been ordered by the Cumberland Hospital to do so and Mr. Anderson has not been back out.

PRAYER FOR RELIEF

H.) As a further direct and proximate result of gross negligence mention violation the Defendant's cause the Plaintiff suffering and continuing to suffer inconvenience and discomfort incurred and well into the future, continues to incur expenses medical treatment and suffered other injuries, damage and expenses.

I.) Wherefore, Plaintiff, Terrence Anderson demands a jury trial against all Defendant's and Defendant Corizon, jointly and separately in the amount of \$150,000.00 each Defendant and Defendant Corizon.

J.) A jury trial on all issues triable by jury. Plaintiff's cost of attorney if one is not given by this Honorable Court. Any additional relief this Honorable Court deems just, proper and equitable.

Date 3/10/21

Respectfully Terrence Anderson

VERIFICATION

I have read the following complaint and hereby verify the matters alleged therein are true except as to matters alleged on information and belief, and, as to these I believe them to be true. I certify under penalty or perjury that the forgoing is true and correct.

Date 3/10/21

Respectfully Terrence Anderson

CERTIFICATE OF SERVICE

I am Terrence Anderson Indigent and can't afford to pay the costs of filing this complaint Motion. I am filing in the United States District Court of Maryland, 101 W. Lombard Street, Baltimore, MD 21202-2691. Ask the Court Clerk to serve all parties on my behalf.

Date 3/10/21

Respectfully Terrence Anderson